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7 EXPERIAN INFORMATION SOLUTIONS, INC.

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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 JANET PERKINS,  
13 Plaintiff,  
14 v.  
15 EXPERIAN INFORMATION SOLUTIONS,  
INC.; ET AL.,  
16 Defendants.

Case No. 3:16-cv-06347-MMC

Assigned to: Maxine M. Chesney

**SECOND JOINT STIPULATION AND  
~~PROPOSED~~ ORDER FOR  
EXTENSION OF TIME TO RESPOND  
TO COMPLAINT**

20 On November 1, 2016, Plaintiff Janet Perkins (“Plaintiff”) filed a Complaint in this action,  
21 one of many Complaints filed by Plaintiff’s counsel on the same day. Shortly thereafter, Plaintiff  
22 and Experian agreed to an extension for Experian to answer or otherwise respond to the  
23 Complaint by February 1, 2017.

24 In accordance with Local Rule 6-1(a), Plaintiff and Experian now agree to a second  
25 extension for Experian to answer or otherwise respond to the Complaint. Experian’s response to  
26 Plaintiff’s Complaint is due February 28, 2017. To the extent that Experian files a motion to  
27 dismiss in this case, Experian agrees that Plaintiff shall have 30 days to respond. Experian will  
28 thereupon have 21 days for any reply.

1        This further extension is necessary given Experian's pending motion to consolidate this  
2 case with the many other cases filed by Plaintiff's counsel, as well as Experian's pending motions  
3 to dismiss numerous other Complaints filed by Plaintiff's counsel, which raise legal issues that  
4 are identical to the ones presented by Plaintiff's Complaint.

5        Accordingly, IT IS HEREBY STIPULATED by and between Plaintiff and Experian, that  
6 the deadline for Experian to answer or otherwise respond to the Complaint is extended until  
7 February 28, 2017. Plaintiff's deadline to respond to any motion to dismiss is extended to 30  
8 days from filing, and Experian's deadline to reply in support of a motion to dismiss is extended to  
9 21 days from filing the opposition.

10

11 Dated: January 9, 2017

*/s/ Elliot W. Gale*

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Attorneys for Plaintiff  
Janet Perkins

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Dated: January 9, 2017

*/s/ Valerie McConnell*

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Attorneys for Defendant  
Experian Information Solutions, Inc.

## **ECF CERTIFICATION**

I, Valerie McConnell, hereby attest pursuant to Local Rule 5-1(i)(3) that the concurrence to the filing of this document has been obtained from each signatory hereto.

Executed this 9th day of January, 2017, at Palo Alto, California.

/s/ Valerie McConnell  
Valerie McConnell (SBN 274159)  
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Atorneys for Defendant  
Experian Information Solutions, Inc.

## {PROPOSED} ORDER

The Court, having considered the parties' Second Joint Stipulation for Extension of Time to Respond to the Complaint, hereby extends Experian Information Solutions, Inc.'s ("Experian") deadline to answer or otherwise respond to the Complaint to February 28, 2017. Plaintiff's deadline to respond to any motion to dismiss is extended to 30 days from filing <sup>of said motion</sup>~~X~~, and Experian's deadline to reply in support of a motion to dismiss is extended to 21 days from filing the opposition.

8 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

0 || DATED: January 10, 2017

Maxine M. Chesney  
The Honorable Judge Maxine M. Chesney  
UNITED STATES DISTRICT JUDGE